

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**FEDERAL RESERVE BANK OF SAN
FRANCISCO,**
Plaintiff

Civil No. 23-01034 (GMM)

v.

**OTO ANALYTICS, LLC; BENWORTH
CAPITAL PARTNERS PR, LLC;
BENWORTH CAPITAL PARTNERS, LLC;
BERNARDO NAVARRO and CLAUDIA
NAVARRO,**
Defendants

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

TO THE HONORABLE COURT:

COME NOW, Plaintiff Federal Reserve Bank of San Francisco (“Reserve Bank”) and Defendants Benworth Capital Partners PR, LLC, Benworth Capital Partners, LLC, Bernardo Navarro, and Claudia Navarro (collectively, “Defendants”; together with the Reserve Bank, the “Parties”), through their undersigned counsel, respectfully submit this *Joint Stipulation of Dismissal with Prejudice* pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

1. On July 10, 2024, the Reserve Bank filed a *Complaint in Federal Reserve Bank of San Francisco v. Benworth Capital Partners LLC et al.*, Civil No. 24-01313 (the “Consolidated Case”) for, among other relief, damages for breach of contract, collection of money, conversion, and rescission of fraudulent transfers against Defendants.

2. On August 20, 2024, the Court entered an *Order* consolidating *Oto Analytics, LLC v. Benworth Capital Partners PR LLC, et al.*, Civil No. 23-cv-01034 (the “Womply Action”) and the Consolidated Case.

3. On April 16, 2025, Defendants filed answers to the *Complaint*.

4. The Parties have entered into a *Confidential Settlement Agreement* (the “Agreement”) that puts an end to the Consolidated Case.

5. In accordance with the terms of the Agreement, and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the Parties file this stipulation of dismissal of the Consolidated Case with prejudice, without the imposition of costs or attorney’s fees on either the Reserve Bank or Defendants.

WHEREFORE, it is very respectfully requested that this Honorable Court (i) take notice of the aforementioned, and (ii) enter judgment dismissing with prejudice the Consolidated Case, without the imposition of costs or attorney’s fees.

Dated: September 9, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies that on September 9, 2025, the foregoing document was filed with the Clerk of the Court using CM/ECF, which sent notice to all parties receiving notifications through the CM/ECF system.

Dated: September 9, 2025

By: /s/ Aníbal A. Román Medina